

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

MAILED 10 P 30 2019

STEVEN PALANGE

&. K.P. a minor child

C.A. NO. 1:19-cv-00340-JJM-PAS

PRO SE PLAINTIFFS

v.

Margarita E. Palange, Richard Updegrove,
Sandra Lanni, Tanya Gravel, Lois Iannone,
Michael B. Forte, Ronald Pagliarini,
Peter F. Neronha, Jean Maggiacomo,
Courtney E. Hawkins

- all in their official and personal capacity as private citizens.

DEFENDANTS

PLAINTIFF'S MOTION FOR RECONSIDERATION OF
"MOTION FOR INJUNCTIVE RELIEF"

Now comes the Plaintiff, Steven J. Palange representing himself and his minor daughter K.P. and humbly requests the court to Reconsider their Denial of his injunction for emergency relief.

The Court misunderstood my Motion for Injunctive Relief to stay or interfere with Rhode Island State Court proceedings. I do not seek relief that interferes with any state court proceeding.

1. I am seeking prospective injunctive relief from impending and ongoing violations of Federal laws, including impending and ongoing violations and deprivations of my and my daughters Constitutional Rights.
2. I seek only injunctive relief from this Court to enjoin Michael Forte, the defendants and their collaborators from continuing to engage in ongoing practices of violating Federal laws and my and K.P's Constitutional Rights. In this matter, my daughter has been abducted from me, by fraud and frauds upon the courts that are routinely practiced in Rhode Island State courts. Transcripts are fraudulently altered and are not reliable for use in any courts, filing, pleadings and appeals are obstructed from entering court. I am further bullied and threatened to not speak about things and dishonest practices that I observe concerning individuals working under the control of Michael Forte.
3. My defenses, litigation and online speech are obstructed. I am facing imprisonment in retaliation for my speech and for filing this lawsuit. I am also threatened with substantial amounts of money to be taken from me unlawfully, all by a corrupt and dishonest organization managed and controlled by Michael Forte and other individuals.
4. I seek relief under Ex Parte Young that seeks to prevent Mr. Forte and others from further altering transcripts, providing dishonest court services, provides dishonest private legal services, kidnapping via fraud and physical force, destroying records of group and individual misconduct, causing my pleadings and appeals to be obstructed from courts and due process, bullying and intimidation in and out of the courtrooms to be silent and to prevent me from being heard and to prevent honest recordings now and in the future. And I seek to prevent their unlawful and dishonest practices employed in and out of courtrooms from further violating our, myself and K.P. my

daughter's Rights. We want the court to prevent the defendants from causing further injuries to us.

5. Under the Supremacy Clause of the United States Constitution the Supreme law of this land is that the United States Constitution is the Supreme Law of this land.
6. This Injunction seeks only prospective injunctive relief. Michael Forte is sued in his Official capacity. His conduct requires the law to strip any official state status from him and allow the suit to continue against him as an individual person without state authority or immunity. His conduct of causing individuals and organizations to violate laws and rights of myself and K.P clearly violets clearly established Constitutional Rights.
7. This injunction only seeks to require Michael Forte and others to simply refrain from further violating the federal laws and Constitutional Rights of K.P. and myself. The law is clearly established that Forte and others cannot engage in practices and patterns that violate our fundamental rights to family integrity, due process, and honest court, governmental and legal services, honest governmental records, free speech, access to justice and freedom of property free from deprivation without due process and dishonesty.. The law already requires the defendants to simply follow the laws. This injunction seeks nothing greater or less than just that.
8. Since at least May 09, 2018 I have witnessed and suffered the loss of my daughter, money and enjoyments of life, I am continuously threatened by the defendants and others that work on Mr. Forte's de factual behalf and benefit.
9. I am continuously prevented from presenting my case to court, the public and from raising and living with my daughter. We have been separated for over a year now and everybody under the influence of Michael Forte engages in and authorizes massive

ongoing frauds and coverups. The quality of justice I have access to in all Rhode Island courts and government amounts to no access to honest court and governmental services. It is not possible for Steven Palange and K.P. to be heard by a Rhode Island court that is not corrupted with routine and ongoing practices of fraud, theft and dishonesty.

10. My daughter and my Constitutional rights to be together as father and daughter and family will continue to be injured and deprived of us by frauds and crimes disguised as legitimate governmental activities until this Court prevents the ongoing frauds and crimes practiced by Mr. Forte and others.
11. Neither my daughter nor I are allowed to be heard in court and online. My Affidavit clearly shows a series of repeating acts and events that continuously violate federal laws including but not limited to violations of the Federal Civil Rights civil and criminal Statutes. It also shows great and almost ultimate interferences in family integrity. There are no facts known or articulated facts in or from the public or courts that can justify this and the accompanying dishonest official conduct the facts demonstrate that The Rhode Island Courts are prevented from creating truthful records and judging our cases fairly and free from corruption
12. My complaint is not against the State of Rhode Island court or it's proceedings. It's a complaint to stop Michael Forte in his official and personal capacity and others from ever violating my and our Constitutional Rights to be heard in any court and any other court process.
13. This injunction seeks to enforce and protect, in the future, the Supreme law of the land. 42 U.S.C. sec. 1983 is an appropriate law to enforce our Constitutional Rights.

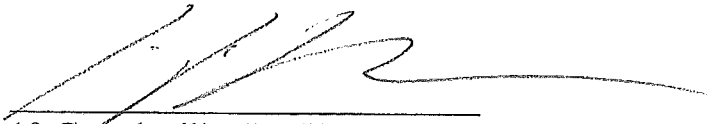
14. According to Verizon Maryland Incorporated vs. Public Services Commission of Maryland The Supreme Court stated “ a court need only conduct a straightforward inquiry into whether the complaint alleges an ongoing violation of federal law and seeks relief properly characterized as prospective”.
15. Our complaint, the Plaintiff and his minor daughter K.P. and other pleadings containing important facts and events in this case clearly show ongoing and continuing unlawful governmental conduct and violations of our federally protected rights.
16. The defendants are very aware of their personal and group conduct that violates the laws. This case and other complaints made by other individuals clearly show that the defendants are aware that their conduct violates the laws and Constitution of the United States. And this abuse clearly show that the defendants will continue to violate the laws and Federally protected rights of K.P and Myself.

RELIEF

1. This Court should at least conduct a preliminary hearing with the defendants summoned and heard. My evidence will show the need to enjoin the defendants and enforce the laws.
2. I respectfully move the Court to reconsider the denial of my Injunction and to set a date for a hearing for a preliminary restraining Order.

Respectfully submitted,

Steven J. Palange
By himself Pro Se,

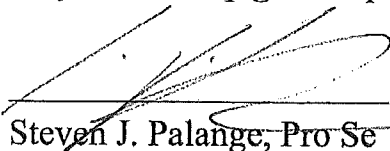


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PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY OF ALL
ISSUES SO TRIABLE.

CERTIFICATION OF SERVICE

I hereby certify that on the 19th day of August, 2019 I emailed a copy of this document to Attorney Sean Lyness, Justin J. Sullivan at SLyness@riag.ri.gov, jjsullivan@riag.ri.gov, Tamara Rocha at trocha@courts.ri.gov, Stephen M. Prignano at smp@mtlesq.com.


Steven J. Palange, Pro Se